

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

**UNITED STATES OF AMERICA**

**V.**

**JANICE MOSES**

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**CASE NO: 06-cr-174-WKW**

**UNOPPOSED MOTION TO CONTINUE TRIAL**

**COMES NOW** the Defendant, Janice Moses (“Ms. Moses”), by undersigned counsel, Christine A. Freeman, and respectfully requests, pursuant to 18 U.S.C. § 3161(h)(8)(A), that this Court continue this matter from October 16, 2006 trial docket to the January 8, 2007 trial docket.

In support of this motion, the Defendant would show that such continuance will serve the ends of justice, in that failure to grant a continuance would deny counsel for the defendant or the attorney for the government the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(B)(iv).

In further support, the Defendant would show:

1. Additional time is needed to review discovery. Defense counsel has communicated with government counsel and initiated arrangements to physically review the 2,000+ items seized from Ms. Moses’ flea market booth.

2. The attorney for the government in this case, Verne H. Speirs, Esq., does not oppose this motion.

3. A Speedy Trial Waiver is being filed at the same time as this Motion.

**WHEREFORE**, the defendant respectfully prays that this Motion be granted.

Respectfully submitted,

**s/Christine A. Freeman**

**CHRISTINE A. FREEMAN**  
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**CERTIFICATE OF SERVICE**

I hereby certify that on October 3, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:  
Verne H. Speirs, Esq., Assistant United States Attorney, One Court Square, Montgomery, AL 36104.

**s/Christine A. Freeman**  
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